

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,	)	CASE NO. 1:07CV06214
	)	
Plaintiff,	)	JUDGE BARBARA S. JONES
	)	
	)	MAGISTRATE JUDGE DEBRA C. FREEMAN
	)	
vs.	)	<b>PHILIPS ELECTRONICS NORTH AMERICA</b>
	)	<b>CORPORATION'S MOTION TO PREVENT</b>
	)	<b>DISSEMINATION AND DISCLOSURE OF</b>
	)	<b>PHILIPS ELECTRONICS NORTH AMERICA</b>
KONINKLIJKE PHILIPS ELECTRONICS	)	<b>CORPORATION'S AND KONINKLIJKE</b>
N.V., <i>et al.</i> ,	)	<b>PHILIPS ELECTRONICS N.V.'S</b>
	)	<b>CONFIDENTIAL, PROPRIETARY, AND/OR</b>
Defendants.	)	<b>ATTORNEY-CLIENT PRIVILEGED</b>
	)	<b>INFORMATION BY PLAINTIFF</b>

(EXPEDITED CONSIDERATION REQUESTED)

**TO:** Raymond Nardo, Esq.  
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Attorney for Plaintiff

**COUNSEL:**

**PLEASE TAKE NOTICE** that on a date to be scheduled by the United States District Court for the Southern District of New York, Defendant Philips Electronics North America Corporation shall move before The Honorable Judge Barbara S. Jones for an Order preventing Plaintiff John F. Vodopia from further disclosing or disseminating Defendants' confidential, proprietary, and/or attorney client privileged information.

**PLEASE TAKE FURTHER NOTICE** that in support of this application Defendant Philips Electronics North America Corporation shall rely upon the accompanying Memorandum, which is incorporated herein by reference.

Respectfully submitted,

s/ Kristin Somich

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2007, a copy of Philips Electronics North America Corporation's Motion to Prevent Dissemination and Disclosure of Philips Electronics North America Corporation's and Koninklijke Philips Electronics N.V.'s Confidential, Proprietary, and/or Attorney-Client Privileged Information by Plaintiff and to Prevent Spoliation of Evidence by Plaintiff was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

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